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plaintiff, because the rate of exchange was changing in favor of the country in which the suit was brought. It may well be inquired whether the courts would stand by the rule if the converse of this were true, so that the verdict would be less favorable to the plaintiff. If the New York court and the United States court should stick to the rule, they would apparently be out of harmony with the theory of the New York court in *Baker v. Drake*, 53 N. Y. 211 (1873), as to the measure of compensation in case of conversion of stocks of fluctuating value, the rule which was afterward adopted by the United States court in *Galligher v. Jones*, 129 U. S. 193 (1888). But whatever may be said about consistency—if we may assume that the courts of last resort in New York and in the United States will uphold their subordinate courts—we seem at last to have reached a uniform rule in England and in America, and as this solution seems not only to be in accord with justice but also not out of harmony with the fundamental theories of proper legal compensation, we may assume that our law on this point is finally settled.

DIVORCE—FOREIGN DECREE, GRANTING HUSBAND DIVORCE, A BAR TO WIFE'S SUIT TO RECOVER SUMS FOR NECESSARIES.—A wife brought an action against her husband in New York to recover from him the sums which she claimed to have spent out of her separate estate, in discharge of his obligation to provide her with the necessities of life suitable to her condition. While this action was pending the husband began an action in Nevada against the wife for divorce on the ground of extreme cruelty. She appeared and defended the action, denying the allegations of the complaint, and setting up abandonment and non-support as a defense. The Nevada court entered a final decree in favor of the husband, dissolving the marriage. He thereupon served a supplemental answer in the action pending in New York, setting up the Nevada decree as a bar. *Held*, the decree of the Nevada court was a bar to the wife's suit in New York. *Pearson v. Pearson* (N. Y., 1920), 129 N. E. 349.

The wife's claim was that her husband abandoned her without making any provision for her support, and therefore all expenditures for necessities made by her during the period of abandonment should be repaid to her by her husband. On the other hand, her husband claimed that he was justified in leaving her upon her own resources during all the period for which she is claiming compensation, because of her conduct. The pleadings in the Nevada divorce case presented the question of the right of the husband to abandon his wife during the entire period when the expenditures sued for were made, and this issue was tried and determined in the husband's favor by the decree. The decision in the principal case is therefore sound, because in this case the wife is seeking to re-litigate the very issues decided adversely to her by the Nevada court. This cannot be done under the full faith and credit clause of the Constitution of the United States (Art. 4, Sec. 1). See *Fauntleroy v. Lum*, 210 U. S. 230; *Harris v. Baek*, 198 U. S. 215; *MINOR, CONFLICT OF LAWS*, p. 188.